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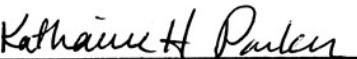
VIA ECF

July 10, 2023

Hon. Katharine H. Parker
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Provisionally granted subject to the court's review of the proposed redactions to ensure they meet applicable standards for filing under seal.

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.

Re: Spectrum Dynamics Medical Limited (Plaintiff) v. GE et al. (Defendants); 07/12/2023
Case No.: 18-cv-11386 (VSB)

Dear Judge Parker:

Pursuant to Federal Rule of Civil Procedure 5.2(e), Your Honor's Individual Rule of Practice III(d), and the parties' Stipulated Protective Order (ECF No. 156), the parties jointly request permission for Spectrum to (1) file in redacted form its Reply in Support of its Motion Seeking to Pierce Privilege Based on the Crime-Fraud Exception and Challenging Defendants' Claw-Back and (2) file under seal Exhibits CC and DD thereto.

Throughout its Reply, Spectrum references and quotes internal GE documents and GE witness testimony, all of which GE has designated as Highly Confidential under the parties' Stipulated Protective Order. Likewise, Exhibit CC is an internal GE document that GE has designated as Highly Confidential under the parties' Stipulated Protective Order. And Exhibit DD is an excerpt of the deposition transcript of Mr. Yaron Hefetz, which GE has provisionally designated as Highly Confidential under the parties' Stipulated Protective Order. The Stipulated Protective Order defines "Highly Confidential" information as "highly sensitive 'CONFIDENTIAL' Information or Items, disclosure of which to another Party or Non-Party would create a substantial risk of serious harm that could not be avoided by less restrictive means, including but not limited to any form of trade secret or other confidential research, development, financial or commercial information within the meaning of Federal Rule of Civil Procedure 26(c)(1)(G)." ECF No. 156 ¶ 9.

Accordingly, the parties respectfully request permission for Spectrum to file its Reply in redacted form and Exhibits CC and DD thereto under seal.



Hon. Katharine H. Parker
July 10, 2023
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Respectfully Submitted,

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cc: All counsel of record (via ECF)